IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

GIOVANNI ("HENRY") MONTOYA, et al.,)))
On behalf of themselves and all others similarly situated,	
Plaintiffs,	Case No. 1:07-cv-0455 (CCB)
v.	
S.C.C.P. PAINTING CONTRACTORS, INC., et al.,	
Defendants.)))

PLAINTIFFS' MOTION TO COMPEL DISCOVERY FROM DEFENDANT S.C.C.P. PAINTING CONTRACTORS, INC.

The Plaintiffs in this case, by counsel and pursuant to Fed. R. Civ. P. 37 and L.R. 104.8, hereby respectfully move this Court for an order compelling Defendant S.C.C.P. Painting Contractors, Inc. ("S.C.C.P.") to respond fully to Plaintiff Giovanni Montoya's First Set of (Class Discovery) Document Requests ("First Document Requests").

The bases for this Motion are set forth in the accompanying memorandum. A Proposed Order has also been filed in support of this Motion.

Dated: August 6, 2007

Respectfully submitted,

/s/

David J. Cynamon (Bar No. 05620) Anne E. Langford (Bar No. 16439) Pillsbury Winthrop Shaw Pittman, LLP 2300 N Street, N.W.

Washington, D.C. 20037 Phone: 202-663-8000 Fax: 202-663-8007

E-mail: david.cynamon@pillsburylaw.com anne.langford@pillsburylaw.com

and

Laura E. Varela (Bar No. 28260) Susan E. Huhta (Bar No. 14547) Washington Lawyers' Committee for Civil Rights and Urban Affairs 11 Dupont Circle, NW Suite 400 Washington, DC 20036

Phone: 202-319-1000 Fax: 202-319-1010

E-mail: laura_varela@washlaw.org sue_huhta@washlaw.org

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August 2007, Plaintiffs' Motion to Compel Discovery from Defendant S.C.C.P. Painting Contractors, Inc., the memorandum in support thereof, Proposed Order, and accompanying Exhibit were served First Class Mail, postage prepaid, on the following counsel of record:

G. Randall Whittenberger MILES & STOCKBRIDGE, P.C. 30 West Patrick Street, 6th Floor Frederick, MD 21701

> /s/ Anne E. Langford